

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
 Plaintiff,)
)
)
)
 vs.) **No. 08 CR 109**
) **Honorable Milton I. Shadur**
)
CALVIN LOCKHART,)
 Defendant.)

**DEFENDANT CALVIN LOCKHART'S MOTION FOR IMMEDIATE
DISCLOSURE OF FAVORABLE EVIDENCE**

Now comes Defendant, Calvin Lockhart, by his attorney, Linda Amdur, pursuant to Rule 16(a)(1) of the Federal Rules of Criminal Procedure and the principles announced in Brady v. Maryland, 373 U.S. 83 (1963), and moves this Court to require the government to disclose immediately any previously undisclosed evidence or information in its possession, custody, or control, the existence of which is known, or by the exercise of due diligence may become known, which is favorable to the defendant and is material to the issues of his guilt, innocence, or sentencing, or which consists of documents or tangible objects which are material to the preparation of the defense.

Defense counsel has received from the government certain information and documents pursuant to Local Criminal Rule 16.1. The instant motion is required in order to request additional materials and to preserve on the record any issues under the foregoing authorities, as the protections afforded thereunder are contingent upon a defense request.

The information requested includes, but is not limited to the following:

1. Any documentary evidence or information which contradicts or is inconsistent with the expected testimony of any witness for the government.
2. Any prior statements of a witness for the government which are inconsistent with his or her expected trial testimony.
3. The name, last known address and statement, grand jury testimony, or memorandum of interview, if any, of any individual whose testimony would be favorable to the defendant in any way or consistent with his innocence.
4. Any and all books, papers, records, documents, evidence favorable to the defendant or are consistent with his innocence or are material to the preparation of his defense or are intended for use by the government as evidence at trial.

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Respectfully submitted,

S/Linda Amdur
Linda Amdur, Attorney for
Defendant Calvin Lockhart

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that in accordance with Fed. R. Crim. P. 49, Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic case Filing (ECF), Defendant Calvin Lockhart's Motion For Immediate Disclosure of Favorable Evidence was served pursuant to the district court's ECF system as to ECF filers on March 28, 2008.

Respectfully submitted,

S/Linda Amdur
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